

November 9, 2005

Paul C. Besozzi
(202) 457-5292
pbsozzi@pattonboggs.com

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Submission – WT Docket No. 02-55 – Preferred Communication Systems, Inc. – Demonstration Of Lack Of Spectrum In Major Cities To Provide “Comparable Facilities.”

Dear Ms. Dortch:

On October 17, 2005, Preferred Communication Systems, Inc. filed an analysis performed by Concepts To Operations, Inc. (“CTO”), an experienced telecommunications and information systems engineering and consulting firm that has actively participated in this docket on a number of occasions. The analysis of over 570 cites in the U.S. demonstrated a lack of channels in a number of them to accommodate the provision of “comparable facilities” as required by the Commission’s Rebanding Orders.

Attached is a slightly revised version of that analysis. The sole change is on page 15 at the top, changing the percentage relating to New York from 64% to 96%.

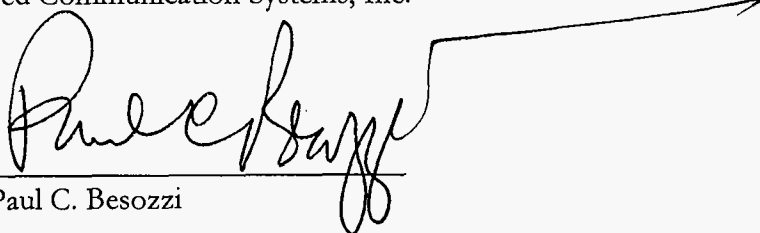
Pursuant to Section 1.1206(b) of the Commission’s rules, this letter is being filed electronically through ECFS.

Respectfully submitted,

Preferred Communication Systems, Inc.

By:

Paul C. Besozzi





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cc: Charles M. Austin
Michael J. Wilhelm
Office of Chairman Kevin J. Martin
Office of Commissioner Kathleen Q. Abernathy
Office of Commissioner Michael J. Copps
Office of Commissioner Jonathan S. Adelstein
Transition Administrator